

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

In Re Application of

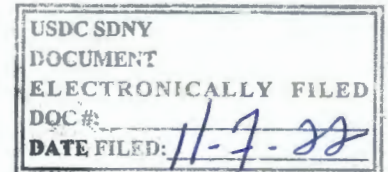
Webuild S.p.A. and Sacyr S.A.,

*Applicants,*

To Obtain Discovery for Use in an International  
Proceeding

Case No. 1:22-mc-00140-LAK

**\*ORAL ARGUMENT REQUESTED\***



**NOTICE OF THE REPUBLIC OF PANAMA'S MOTION TO INTERVENE, TO  
VACATE THE COURT'S MAY 19, 2022 ORDER, AND TO QUASH THE WSP USA  
SUBPOENA**

PLEASE TAKE NOTICE that the Republic of Panama will move this Court, before the Honorable Lewis A. Kaplan, in Courtroom 21B, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, for an Order granting Panama's motion to intervene, to vacate the Court's May 19, 2022 Order, to quash the WSP USA subpoena, and any other further relief as this Court may deem just and proper. This motion is based upon the accompanying Memorandum of Law in support thereof, the Declaration of Mélida Hodgson, and accompanying exhibits.

Memorandum Endorsement

In re Application of Webuild S.P.A., et ano., 22-mc-140 (LAK)

The motion of the Republic of Panama to intervene for the purpose of moving to vacate the Court's May 19 2022 Order and to quash the WPA USA subpoena is granted as a matter of right and, in the alternative, as a matter of discretion. *In re Klein*, No. 20-mc-203 (PKC), 2022 WL 1567584 (S.D.N.Y. May 18, 2022); *see Application of Sarrio, S.A.*, 119 F.3d 143, 148 (2d Cir. 1997).

SO ORDERED.

Dated: November 7, 2022

A handwritten signature in black ink, appearing to read "Lewis A. Kaplan", is written over a horizontal line.

Lewis A. Kaplan  
United States District Judge